

1 J. Stephen Peek
(Nevada Bar No. 1758)
2 Erica C. Medley
(Nevada Bar No. 13959)
3 HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
4 Las Vegas, NV 89134
Tel: 702.669.4600
5 Fax: 702.669.4650
6 speak@hollandhart.com

7 Tariq Mundiya (admitted *pro hac vice*)
Jeffrey B. Korn (admitted *pro hac vice*)
8 WILLKIE FARR & GALLAGHER LLP
787 Seventh Avenue
9 New York, New York 10019
(212) 728-8000
10 tmundiya@willkie.com
jkorn@willkie.com

11 Michael J. Gottlieb (admitted *pro hac vice*)
12 WILLKIE FARR & GALLAGHER LLP
1875 K Street, NW
13 Washington, DC 20006
(202) 303-1000
14 mgottlieb@willkie.com

15 *Attorneys for Plaintiffs*
16 *Jysan Holding, LLC; and*
Jusan Technologies Ltd.

17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 JYSAN HOLDING, LLC, a Nevada Limited
20 Liability Company; JUSAN
TECHNOLOGIES LTD, an England and
21 Wales Limited Company;

22 Plaintiff,

23 v.

24 REPUBLIC OF KAZAKHSTAN, a foreign
sovereign state; THE AGENCY FOR
25 REGULATION AND DEVELOPMENT
OF THE FINANCIAL MARKET OF THE
26 REPUBLIC OF KAZAKHSTAN, a
Kazakhstan Government agency; THE
27 ANTI-CORRUPTION AGENCY OF THE
REPUBLIC OF KAZAKHSTAN, a
28 Kazakhstan Government anti-corruption

Case No. 2:23-cv-00247-JAD-VCF

**STIPULATION TO EXTEND TIME TO
RESPOND TO MOTION TO DISMISS
(First Request)**

agency ; THE FINANCIAL MONITORING
 AGENCY OF THE REPUBLIC OF
 KAZAKHSTAN, a Kazakhstan Government
 agency; THE COMMITTEE FOR
 NATIONAL SECURITY OF
 KAZAKHSTAN, a Kazakhstan Government
 intelligence agency; MADINA
 ABYLKASSYMOVA, an individual;
 OLZHAS KIZATOV, an individual;
 ARMAN OMARBEOV, an individual;
 and ADILBEK DZHAHAKSYBEKOV, an
 individual,

Defendants.

Defendants Madina Abylkassymova, Olzhas Kizatov, and Arman Omarbekov (the
 “Government Official Defendants”) filed a Motion to Dismiss the Complaint on April 13, 2023
 (ECF No. 23). The current deadline for Plaintiffs Jysan Holding, LLC and Jusan Technologies
 Ltd (“Plaintiffs”) to respond to the Motion to Dismiss is April 27, 2023.

Plaintiffs require additional time to respond to the Motion in light of the complexity of
 the issues involved. Plaintiffs and the Government Official Defendants have conferred and
 reached agreement on an extension of Plaintiffs’ time to respond. This is the first stipulation
 for extension of time to respond to the Motion.

IT IS HEREBY STIPULATED AND AGREED that Plaintiffs’ time to respond to the
 Government Official Defendants’ Motion to Dismiss is extended to and including **May 4,**
2023.

DATED this 21st day of April, 2023.

MCNUTT LAW FIRM, P.C.

/s/ Dan McNutt

Daniel R. McNutt, Bar No. 7815
 11441 Allerton Park Drive, #100
 Las Vegas, Nevada 89135

*Counsel for Defendants Madina
 Abylkassymova,
 Olzhas Kizatov, and Arman Omarbekov*

HOLLAND & HART LLP

/s/ J. Stephen Peek

J. Stephen Peek, Bar No. 1758
 9555 Hillwood Drive, 2nd Floor
 Las Vegas, NV 89134

*Attorneys for Plaintiffs
 Jysan Holding, LLC; and
 Jusan Technologies Ltd.*

Jysan Holding, LLC, et al. v. Republic of Kazakhstan, et al.
Case No. 2:23-cv-00247-JAD-VCF
Stipulation and Order to Extend Time to Respond to Motions to
Dismiss and to Stay Discovery

ORDER

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE/
UNITED STATES MAGISTRATE JUDGE

DATED: _____

Case No.: 2:23-cv-00247-JAD-VCF